

Richard Angelmeyer  
November 5, 2020

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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

ADA ANGLEMEYER, et al., : CIVIL ACTION  
Plaintiffs, :  
 :  
vs. :  
 :  
NORTHAMPTON COUNTY, et :  
al., :  
Defendants. : No. 19-3714

- - -  
Thursday, November 5, 2020  
- - -

Deposition of RICHARD ANGLEMEYER,  
taken pursuant to notice, via videoconference,  
before Michele L. Murphy, a Registered  
Professional Reporter and Notary Public, on  
the above date, beginning at approximately  
12:37 p.m.

- - -

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SUMMARY  
JUDGMENT  
EXHIBIT  
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<p>1 APPEARANCES:</p> <p>2</p> <p>3 LEVIN &amp; ZEIGER</p> <p>4 By: BRIAN J. ZEIGER, ESQUIRE</p> <p>5 (Via Videoconference)</p> <p>6 1500 JFK Blvd., Suite 620</p> <p>7 Philadelphia, PA 19102</p> <p>8 215-546-0340</p> <p>9 zeiger@levinzeiger.com</p> <p>10 Representing the Plaintiffs</p> <p>11</p> <p>12 PA OFFICE OF ATTORNEY GENERAL</p> <p>13 By: KEVIN BRADFORD, ESQUIRE</p> <p>14 (Via Videoconference)</p> <p>15 1600 Arch Street, 3rd Floor</p> <p>16 Philadelphia, PA 19103</p> <p>17 215-560-2402</p> <p>18 kbradford@attorneygeneral.gov</p> <p>19 Representing the Defendants</p> <p>20</p> <p>21 ALSO PRESENT: Ada Anglemeyer</p> <p>22 (Via Videoconference)</p> <p>23 ---</p> <p>24</p>	<p>1 (It is hereby stipulated and</p> <p>2 agreed by and between counsel for all</p> <p>3 parties present that this deposition is</p> <p>4 being conducted by videoconference, that</p> <p>5 the court reporter, all counsel, and the</p> <p>6 witness are all in separate remote</p> <p>7 locations and participating via</p> <p>8 videoconference meeting under the control</p> <p>9 of Strehlow &amp; Associates Court Reporting,</p> <p>10 that the officer administering the oath</p> <p>11 to the witness need not be in the place</p> <p>12 of the deposition and the witness shall</p> <p>13 be sworn in remotely by the court</p> <p>14 reporter after confirming the witness'</p> <p>15 identity.</p> <p>16 It is further stipulated that</p> <p>17 exhibits may be marked by the attorney</p> <p>18 presenting the exhibit to the witness,</p> <p>19 and that a copy of any exhibit presented</p> <p>20 to a witness shall be e-mailed to or</p> <p>21 otherwise in possession of all counsel</p> <p>22 prior to any questioning of a witness</p> <p>23 regarding the exhibit in question.)</p> <p>24 (It is hereby stipulated and</p>
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<p>1 INDEX</p> <p>2 WITNESS: Page</p> <p>3 Richard Anglemeyer</p> <p>4 By Mr. Bradford 5</p> <p>5</p> <p>6</p> <p>7</p> <p>8 EXHIBITS</p> <p>9</p> <p>10 No. Description Ref.</p> <p>11 D-10 Medical records for Richard</p> <p>12 Anglemeyer 57</p> <p>13 ---</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 agreed by and between counsel that</p> <p>2 reading, signing, sealing, filing and</p> <p>3 certification are waived; and that all</p> <p>4 objections, except as to the form of</p> <p>5 questions, be reserved until the time of</p> <p>6 trial.)</p> <p>7 ---</p> <p>8 ...RICHARD ANGLEMEYER, after</p> <p>9 having been duly sworn, was examined and</p> <p>10 testified as follows:</p> <p>11 ---</p> <p>12 BY MR. BRADFORD:</p> <p>13 Q. Good afternoon, Mr. Anglemeyer. I</p> <p>14 think you know me at this point, because I</p> <p>15 think you were in the room for most, if not</p> <p>16 the entire deposition before, but I am Kevin</p> <p>17 Bradford. I'm representing the defendants in</p> <p>18 this lawsuit that you and three other members</p> <p>19 of your family have brought.</p> <p>20 I assume you understand what the</p> <p>21 process is because you were sitting there.</p> <p>22 I'm just going to ask you a series of</p> <p>23 questions that relate to the lawsuit, and your</p> <p>24 obligation is to answer the questions to the</p>

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1 best of your ability, to the best of your  
2 recollection. Okay?

3 A. Yes.

4 Q. All right. I'll try not to repeat  
5 some things, but there are some things I'll  
6 have to ask you the same type of thing even  
7 though your wife already answered some of  
8 those questions.

9 First of all, how old are you, sir?

10 A. 80.

11 Q. And you've been married for 60 years  
12 to Ada, correct?

13 A. Correct.

14 Q. Okay. And you also live at 340 Old  
15 Allentown Road?

16 A. Correct.

17 Q. And you are retired?

18 A. Yes.

19 Q. How long have you been retired? You  
20 can tell the year or the number of years.

21 A. Since 1962.

22 THE WITNESS: Isn't that what  
23 it is?

24 MRS. ANGLEMEYER: I don't know.

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1 The bar that your wife spoke about  
2 during her deposition, did you work there or  
3 did you -- did you work there?

4 A. In her business?

5 Q. Yes.

6 A. No.

7 Q. Okay. Before February 23rd, 2018,  
8 did you have any negative feelings toward law  
9 enforcement?

10 A. No.

11 Q. Okay. In February 2018, how many  
12 firearms did you own?

13 A. I can't tell you that, sir. I don't  
14 know. A safe full.

15 Q. Right. So your wife spoke about a  
16 safe that was in the house that kept  
17 several -- several firearms were in that safe?

18 A. Many firearms.

19 Q. Were the firearms in that safe, were  
20 they yours?

21 A. Yes.

22 Q. Okay. Did anyone else in the house  
23 have access to them?

24 A. No.

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1 THE WITNESS: Give me one  
2 second.

3 MR. BRADFORD: Okay.

4 THE WITNESS: Okay, sir. It's  
5 2002.

6 BY MR. BRADFORD:

7 Q. 2002, okay. That sounded a little  
8 more realistic, I guess, than 1962. I'd want  
9 that job when you retire when you were --

10 A. Yeah.

11 Q. So anyway, do you have any hobbies  
12 or activities or anything that you do to keep  
13 you busy?

14 A. You know what, I did up until 78.  
15 Now I don't.

16 Q. Okay. Are you taking any medication  
17 or is there anything that would affect your  
18 ability to understand my questions today and  
19 answer them?

20 A. I'm taking medication, but I can  
21 understand your questions.

22 Q. Okay. And if at any point you don't  
23 understand my question, let me know and I'll  
24 figure out a different way to ask it to you.

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1 Q. Other than your wife, I guess?

2 A. No.

3 Q. Okay. And you have no idea what the  
4 number is on that?

5 THE WITNESS: What did he say?

6 MRS. ANGLEMEYER: Do you know  
7 the number of guns you had?

8 THE WITNESS: No. I inherited  
9 a lot of them.

10 BY MR. BRADFORD:

11 Q. Would it be more than ten? I  
12 understand --

13 A. Oh, yeah. It had to be 30.

14 Q. Okay. It could be 30?

15 A. Mm-hmm.

16 COURT REPORTER: Is that a yes?  
17 I'm sorry.

18 MRS. ANGLEMEYER: Yes.

19 THE WITNESS: Yes.

20 BY MR. BRADFORD:

21 Q. You need to say yes. Right.

22 Did you ever have any involvement in  
23 the Quarry Beach Hideaway business?

24 A. No.

3 (Pages 6 to 9)

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Page 10	Page 12
<p>1 Q. Okay. And you've never been 2 arrested? 3 MRS. ANGLEMEYER: What did he 4 say? 5 THE WITNESS: Was I ever 6 arrested? 7 My son and me got in a shoving 8 match and I was arrested maybe two years 9 ago. 10 BY MR. BRADFORD: 11 Q. How long? 12 A. Two years. 13 Q. Two years ago. And where did that 14 occur at? 15 A. At Bruce Lane on my other property. 16 Q. Where is your other property located 17 at? 18 A. Wind Gap, but 100 Bruce Lane. 19 Q. Okay. Is it next to your property 20 that you're at right now or is it somewhere 21 else? 22 A. Just drive down the road a little 23 bit, make a left, and that's where it is, up 24 in sort of the mountains.</p>	<p>1 do you remember? 2 A. No. 3 Q. Do you know what happened? Do you 4 know if he got convicted or do you know what 5 happened -- 6 A. No, he didn't get convicted. 7 Q. Now, you were sitting there when 8 your wife, Ada, was discussing your property 9 there in Wind Gap and she was looking at the 10 map. Were you listening to that? 11 A. No, I wasn't, to be honest with you. 12 A little bit. 13 Q. Well, the parts that you listened 14 to, do you have any disagreement as to what 15 she said or did she seem to get everything 16 right? 17 A. She seemed to get everything right. 18 Q. So I'm not going to go through that 19 with you, because that would just be 20 duplicative. 21 I do want to talk about the garage 22 that we were talking about, and that was that 23 garage in the red circle that's actually 24 separate from the house, the main house?</p>
Page 11	Page 13
<p>1 Q. Okay. And this incident that we're 2 talking about, did that occur after the 3 troopers came to your house in February of 4 2018? 5 A. Let me think a minute. 6 MRS. ANGLEMEYER: I think it 7 was before. You don't know. 8 THE WITNESS: You know what, I 9 can't remember and I don't want to give a 10 bad false answer. 11 BY MR. BRADFORD: 12 Q. Okay. And which son was this? 13 A. Vernon. 14 Q. Okay. And did you or Vernon get 15 arrested? 16 A. We both did. 17 Q. Okay. And what were the charges, if 18 you remember? 19 A. I don't remember. 20 Q. Was anyone convicted of anything; do 21 you remember? 22 A. I pleaded guilty to like shoving 23 him. 24 Q. Okay. Did he plead guilty as well;</p>	<p>1 A. Different address. 2 Q. Right. Right. First, it's pretty 3 close, right? You just walk across your 4 driveway and then you're there, right? 5 A. Well, about 300 more feet after the 6 driveway. 7 Q. Okay. But if you were -- that's 8 fine. 9 Again, February 2018 is when this 10 incident took place. So that's kind of a 11 benchmark that I'm using here. So February 12 2018 before the police came, would you go in 13 that garage? 14 A. Never. 15 Q. Never? Okay. 16 Who would go in the garage? 17 A. Well, I wasn't at the garage. 18 Strangers I'd see go in, but I don't know 19 what, you know... 20 Q. Okay. And would any of your family 21 members -- was Mark Anglemeyer, would he spend 22 a lot of time out there? 23 A. I know he went in the garage. I 24 don't know how much time he spent out there.</p>

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<p>1 Q. Okay. So you never went to the 2 garage. You didn't know exactly what was in 3 there? 4 A. No, sir. 5 Q. Let me show you a photograph here. 6 Give me one second here. 7 You're looking at what we marked 8 previously as D-3. Have you seen this gun 9 before? 10 A. No. 11 Q. What did you say? 12 A. No. I don't know what it is. 13 Q. So you've never seen that before? 14 A. No. 15 Q. Do you know what's on the end of it 16 on the far right or where my cursor is? 17 A. No, I don't. It looks like a piece 18 of, you know, insulation, pipe insulation. 19 Q. Well, to me it looks like some sort 20 of silencer, but I don't want to put words in 21 your mouth, so I'm just asking you what you 22 think it is or looks like. 23 MR. ZEIGER: And please don't. 24 You can answer.</p>	<p>1 2018? 2 A. Definitely. Definitely. 3 Q. I think your wife mentioned that you 4 kept one in a drawer in the China closet? 5 A. Absolutely, yes. 6 Q. Am I looking at it right now behind 7 you? 8 A. Yeah. 9 Q. All right. You don't have to pull 10 anything out, but I couldn't help but notice 11 that. 12 A. In the drawer. 13 Q. In a drawer. It's not a locked 14 drawer or anything like that? 15 A. No; no lock. 16 Q. Okay. And I guess I do want to 17 confirm the people that lived with you back in 18 February 2018. I'll go through the list and 19 you tell me if I have it right or wrong. 20 Besides you and your wife, I have 21 Joe and Renae Kluska, Jeffrey, Mark, Kierra, 22 Tyeler, and Clyde; is that correct? 23 A. Yes. 24 Q. And I asked about surveillance</p>
Page 15	Page 17
<p>1 THE WITNESS: I don't know what 2 the hell -- why it would even be there. 3 BY MR. BRADFORD: 4 Q. Okay. And can I have 5 Mrs. Anglemeyer sit next to you? 6 A. Sure. 7 Q. I think that would be easier. And 8 just so I have you in the screen, so I know 9 when you're talking to him. Okay. Of course 10 I said sit. Or stand, whatever you're 11 comfortable with. 12 What about the trailer we were 13 talking about? Your wife mentioned that 14 someone else had dropped it off there. Did 15 you ever go in there? 16 A. I've never went in the trailer, no. 17 It's actually like a pull-behind trailer, I 18 think you're referring to. 19 MRS. ANGLEMEYER: Camper. 20 THE WITNESS: Camper. 21 BY MR. BRADFORD: 22 Q. Okay. Other than the guns that were 23 in the safe, would you agree with me that 24 there were other firearms around the house in</p>	<p>1 cameras on the property, and your wife and I 2 spoke about the one camera that was over by, I 3 guess, the rec room that's part of your house? 4 A. Mm-hmm. 5 Q. And there were also surveillance 6 cameras over by the garage? 7 A. That's what I understand. 8 Q. That's what you understand. Do you 9 recall if there are any other surveillance 10 cameras around the property? 11 A. No, not that I know. 12 MRS. ANGLEMEYER: There are, 13 but they don't work. 14 BY MR. BRADFORD: 15 Q. You actually have -- there's an 16 indoor pool attached to your house, I guess? 17 A. Yes. 18 Q. Just give me a second. I'm just 19 skipping through stuff that I'm trying not to 20 ask you. 21 Do you know if Mark Anglemeyer had 22 any guns at the house? 23 A. I never seen any. 24 Q. And he had his own room?</p>

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<p>1 A. Yes, upstairs. 2 Q. Upstairs. And you and your wife 3 lived in the lower level, right? 4 A. Yes. 5 Q. And my understanding is there's two 6 bedrooms down there. Who, if anyone, was 7 living in the other lower level bedroom in 8 February 2018? 9 A. Clyde. Clyde Buskirk. I don't know 10 what time. Jeff was -- 11 Q. And Jeff was -- 12 A. That was Jeffrey's bedroom. 13 Q. I understand that. He was in kind 14 of an area there? 15 A. And then the other bedroom, yes, for 16 us. 17 Q. And everyone besides you, your wife, 18 Jeffrey, and Clyde, you guys would sleep on 19 the lower level and then everyone else slept 20 on the upper level? 21 A. Yes, sir. 22 Q. Is that fair? 23 A. Yes. 24 Q. Okay. Would you go in -- the people</p>	<p>1 answer is no. Or you don't remember, you 2 don't remember. 3 A. Well, I tried to go back three 4 years. 5 Q. Yeah. Think about my question 6 before you answer, but if something comes to 7 mind, that's totally fine. 8 Would there be occasions where you'd 9 be walking around your property holding one of 10 your guns or having it on your hip on like a 11 holster? 12 A. No. I don't have no holsters. If I 13 was hunting, I had the shotgun or whatever 14 and -- hell, that's all I did. 15 Q. Okay. And when you were hunting, 16 would you be hunting on your own property 17 there? 18 A. Yes. Yes. 19 Q. Okay. How often would you be 20 hunting back in February 2018 at least? 21 A. I didn't hunt at all that year. I 22 mean, I'm talking years before. 23 Q. I'm sorry. We lost you for a second 24 there. Can you say that?</p>
Page 19	Page 21
<p>1 in the upper level, would you go in their 2 rooms? 3 A. I can't recall ever -- well, if I 4 had to tell them something, I'd go up the top 5 and yell in. 6 Q. Okay. But you never actually 7 entered anyone's rooms? 8 A. No. That was theirs. 9 Q. Okay. The doors to the rooms at 10 least upstairs, were they locked? 11 A. No. 12 Q. In February of 2018, your wife spoke 13 about how she would do some target practicing. 14 Is that something you would engage in as well? 15 A. No. I don't do that. I'm too P 16 (ph). 17 Q. Would you use your guns for other 18 purposes, like hunting? 19 A. Oh, yes. Yes. 20 Q. Okay. Anything other than hunting 21 would you ever fire your gun? 22 A. Not that I plan, you know. I 23 mean -- no. 24 Q. Look, if the answer is no, then the</p>	<p>1 A. I didn't hunt for quite a few years, 2 but I'm telling you what I did when I hunted. 3 I gave up on that. Too tough. 4 Q. Okay. And about when did you give 5 up hunting, about what year? 6 A. At least ten years. 7 Q. Okay. I don't think I asked you 8 this. If I did, I apologize. Did you recall 9 before February 2018 the police ever coming to 10 your property? 11 MRS. ANGLEMEYER: Yeah. 12 THE WITNESS: Yeah; lots of 13 times. 14 MR. BRADFORD: And, 15 Mrs. Anglemeyer, I know you're trying to 16 help him, but I can hear you feeding him 17 answers, so... 18 THE WITNESS: She don't have to 19 feed me answers. 20 BY MR. BRADFORD: 21 Q. I know. And I understand, but like 22 I'm just asking you. 23 MRS. ANGLEMEYER: He had a 24 nervous breakdown and he don't remember a</p>

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<p>1 lot.</p> <p>2 MR. BRADFORD: Okay. And</p> <p>3 that's actually -- okay.</p> <p>4 BY MR. BRADFORD:</p> <p>5 Q. So you had a nervous breakdown and</p> <p>6 you don't remember a lot; is that correct?</p> <p>7 A. Yeah. It was hell.</p> <p>8 Q. Okay. When did you have a nervous</p> <p>9 breakdown?</p> <p>10 A. After February 23rd of 2018.</p> <p>11 Q. Do you remember how -- did you go --</p> <p>12 A. I don't know when -- that's when</p> <p>13 things started going crazy. I don't know when</p> <p>14 I went to the doctor, but they took me in.</p> <p>15 Q. Okay. And was there an actual like</p> <p>16 specific episode or is this something that</p> <p>17 kind of gradually happened?</p> <p>18 A. I started to scream out, you know,</p> <p>19 yell out craziness. I started to shake. I</p> <p>20 couldn't write no more. What the hell else?</p> <p>21 MRS. ANGLEMEYER: He's still on</p> <p>22 medication for it.</p> <p>23 THE WITNESS: And then they</p> <p>24 gave me medications. Oh, and I</p>	<p>1 but I can write. You know, it gradually got</p> <p>2 me on track.</p> <p>3 Q. Okay. Has your memory improved</p> <p>4 since you've been taking that or is that</p> <p>5 still --</p> <p>6 A. You know, a lot of things come to my</p> <p>7 mind and then I say what the hell, it couldn't</p> <p>8 be. You know what I mean? The episode I'm</p> <p>9 thinking happened, it couldn't. Now I can,</p> <p>10 you know, know. So, you know, it didn't</p> <p>11 happen.</p> <p>12 MRS. ANGLEMEYER: It was bad.</p> <p>13 THE WITNESS: It didn't happen.</p> <p>14 Before I thought it was happening.</p> <p>15 MRS. ANGLEMEYER: He didn't</p> <p>16 want to get out of bed for three months.</p> <p>17 BY MR. BRADFORD:</p> <p>18 Q. Okay. So you didn't want to get out</p> <p>19 of bed for three months after the State Police</p> <p>20 came to your house?</p> <p>21 A. Yeah.</p> <p>22 Q. And then you went in, saw someone,</p> <p>23 and they prescribed this medication for you</p> <p>24 and then things have been better?</p>
Page 23	Page 25
<p>1 started -- I couldn't separate reality</p> <p>2 from what I thought. You know what I</p> <p>3 mean? I thought what I thought was what</p> <p>4 happened. Well, it didn't. And it got</p> <p>5 so bad that...</p> <p>6 BY MR. BRADFORD:</p> <p>7 Q. What medication did you start</p> <p>8 taking?</p> <p>9 A. She knows. Let her look.</p> <p>10 Q. She can answer. That's fine.</p> <p>11 A. She's been taking care of me.</p> <p>12 Q. Okay.</p> <p>13 MRS. ANGLEMEYER: It's</p> <p>14 Sertraline. It's S-E-R-T-R-A-L-I-N-E.</p> <p>15 BY MR. BRADFORD:</p> <p>16 Q. Is that something you're still</p> <p>17 taking today?</p> <p>18 A. Oh, yes.</p> <p>19 MRS. ANGLEMEYER: Yes.</p> <p>20 BY MR. BRADFORD:</p> <p>21 Q. And is that for your mental health</p> <p>22 or your nerves or something like that?</p> <p>23 A. Boy, it works. It calms me down. I</p> <p>24 ain't shaking and I can -- I can't write good,</p>	<p>1 A. Yes.</p> <p>2 Q. Okay. I'm going to come back to</p> <p>3 that in a little bit, but let's talk about</p> <p>4 February 23rd, 2018 and what you remember</p> <p>5 about that day.</p> <p>6 So I guess if you could just tell me</p> <p>7 what happened that morning, what you recall,</p> <p>8 and then I'll ask you some follow-up questions</p> <p>9 just like --</p> <p>10 A. Well, I know what happened.</p> <p>11 Q. Okay. So just take us through the</p> <p>12 moment you woke up or whatever.</p> <p>13 A. I know exactly what happened.</p> <p>14 Q. Okay.</p> <p>15 A. I was asleep on the couch with the</p> <p>16 dog. The dog started growling. I got up to</p> <p>17 check with the dog and I told him to shut up,</p> <p>18 but he wouldn't. He just like growled. So</p> <p>19 finally I got up and I walked out in the</p> <p>20 kitchen. That's where that doors are.</p> <p>21 Q. Okay.</p> <p>22 A. I looked out, and I thought what I</p> <p>23 saw was a fire truck. It looked pretty big,</p> <p>24 and I thought what the hell. There's got to</p>

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1 be a fire. Then I heard yelling out there.  
2 So I doubled around and where you walk up the  
3 stairway to the upper deck where the bedrooms  
4 are upstairs, I yelled fire, fire, get the  
5 dogs, get out. The hell with everything else.  
6 Just get out.

7 So then I come in here, and I was  
8 standing here looking out and I still see this  
9 truck with lights flashing, and I still  
10 thought it was a fire. And then all of the  
11 sudden, I heard a big crash upstairs, and the  
12 next thing happened, a big crash, yeah, and  
13 then I heard screaming and hollering and  
14 yelling. I thought, you know -- I yelled up,  
15 never mind, don't try and get them out of the  
16 house. You know, just get out. I thought  
17 they upset furniture up there.

18 And so I come back down and I walked  
19 over, and I still hear hollering outside now.  
20 So I start walking over to the door, and all  
21 of the sudden the whole front of the house,  
22 the doors and the side panels, come flying in,  
23 and I'm standing there, still thinking it's a  
24 fire. Everybody start -- whole bunch start

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1 running past me and running through the house.

2 And so that's about what happened  
3 there. Then I went in the bedroom -- into the  
4 living room where I was -- you know, where the  
5 couch is, and then a guy with plain clothes  
6 come in and frisked me. And what happened  
7 next then? Oh, then I just stood over there.  
8 There was a fireplace. I just walked over and  
9 stood at the fireplace, you know, just stood  
10 there, because I still didn't really  
11 comprehend what was going on.

12 Well, what happened next? Oh,  
13 should I continue on with the whole story?

14 Q. Yes. Keep going, and then I'll come  
15 back and ask you a few follow-up questions.

16 A. Okay.

17 THE WITNESS: What did he say?

18 MRS. ANGLEMEYER: I don't know  
19 what he said.

20 BY MR. BRADFORD:

21 Q. Keep going. You're standing by the  
22 fireplace?

23 A. Okay. I'm standing by the  
24 fireplace, and then people were running

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1 around, you know, the cops, now that I know  
2 they're cops. They were running all around,  
3 and I just stood at the fireplace. And then a  
4 cop come in, two cops come in, stood in front  
5 of me with a bright light and, you know, moved  
6 it back and forth like this here (indicating),  
7 and then I got blinded. I couldn't follow it  
8 no more. And the next thing I know, I got  
9 hit, you know, in the face and stuff.

10 Q. Okay.

11 A. And I felt -- and like at the throat  
12 here, and then I knew I was going down, and I  
13 went down and hit the concrete, and that's all  
14 I can remember for a while.

15 Q. Okay. All right. Let's stop there  
16 then.

17 Before you got hit, you realized  
18 that these were police officers?

19 A. Yes, sir.

20 Q. Okay. And you were just standing  
21 there and there were police officers just  
22 running around?

23 A. Yeah. They were running through the  
24 room and going into the next room.

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1 Q. What were they saying?

2 A. They didn't say a word. I said, why  
3 are you's ever doing something like this?

4 And one cop yells back, because we  
5 can.

6 Q. And that's while you're standing  
7 there?

8 A. Yeah.

9 Q. Okay. So you saw them. You said  
10 you thought they were firemen; is that --

11 A. Just in the beginning.

12 Q. In the beginning, right. And did  
13 you realize they weren't firemen before or  
14 after they entered the house?

15 A. After they entered the house, I knew  
16 they were something. You know, they didn't  
17 have police uniforms on. They had like  
18 combat.

19 Q. Did they identify themselves like  
20 State Police?

21 A. No. Nobody said nothing.

22 Q. Nobody said anything? Okay.

23 And they were just essentially  
24 ignoring you, I guess, initially?

8 (Pages 26 to 29)



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1 A. Yeah. Initially I was standing  
2 there and they were running past me, and I  
3 just -- I couldn't figure it out, to be honest  
4 with you.  
5 Q. Okay. Did anyone ask you or  
6 instruct you or order you to get on the  
7 ground?  
8 A. No.  
9 Q. Did anyone instruct you, order you  
10 or tell you to do anything?  
11 A. No.  
12 Q. Now, you talked about the brief  
13 conversation you had with the one person.  
14 Before you got hit, did you speak to anybody  
15 else?  
16 A. No, sir.  
17 Q. About how long passed between the  
18 time that they entered the house -- you're on  
19 the lower level, right, is what we're talking  
20 about?  
21 A. What?  
22 Q. On the lower level of the house?  
23 A. Yes.  
24 Q. So they entered the lower level,

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1 seconds, because they crashed into the  
2 upstairs first before they came in here.  
3 Q. So you heard them enter upstairs  
4 first and then --  
5 A. Yeah. I heard Joe screaming and  
6 something really -- I thought the furniture  
7 fell over.  
8 Q. Okay.  
9 A. But it was them coming through with  
10 that ram.  
11 Q. You mentioned the plain clothes  
12 officer who frisked you?  
13 A. Yes.  
14 Q. And did you encounter that person  
15 before you got struck?  
16 A. Before I got struck, absolutely.  
17 Q. Okay. Did he have any like -- what  
18 was he wearing?  
19 A. No. He had a suit on.  
20 Q. He had a suit on, okay.  
21 And can you describe him? Like was  
22 he tall, short, white guy?  
23 A. Oh, he was a white guy.  
24 Q. Yeah. He had a suit on. Did he

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1 right, and then at some point you got hit.  
2 About how much time passed before that time?  
3 A. I'll tell you, it had to be at least  
4 like 10, 12 minutes.  
5 Q. Really? Okay.  
6 When you were sitting on the couch,  
7 were you awake or were you sleeping?  
8 A. I was sleeping and then the dog woke  
9 me.  
10 Q. The dog makes a commotion and that's  
11 what eventually draws you to look outside the  
12 window?  
13 A. Yep. Yes.  
14 Q. Ada, was she in the next room over?  
15 A. Two rooms.  
16 Q. Two rooms. Did you try waking her  
17 up before they --  
18 A. No. I didn't get a chance.  
19 Q. Okay. So when you look out the  
20 window -- from the time from when you look out  
21 the window to when they actually enter the  
22 lower level, was that just a matter of  
23 seconds?  
24 A. No. It was a lot longer than

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1 have any facial hair? How old --  
2 A. No, he didn't have facial hair. I'd  
3 say he's 50-some.  
4 Q. Did he have hair, or what color was  
5 his hair on his head?  
6 A. As far as I can remember, he had  
7 hair. He wasn't bald.  
8 Q. Okay. Do you remember what color  
9 that hair was?  
10 A. No, sir.  
11 Q. Okay. Did he identify himself to  
12 you at all?  
13 A. Come back with that one.  
14 Q. Did he identify himself to you?  
15 A. No. No.  
16 Q. Did he tell you who he was?  
17 A. He searched the couch and me.  
18 Q. And this is while all the other  
19 people are running back and forth through the  
20 house?  
21 A. Mm-hmm. Yes.  
22 Q. All right. And I want to go now to  
23 the part where you get struck. So you said  
24 that two cops -- first of all, other than the

9 (Pages 30 to 33)

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<p>1 guy wearing the plain clothes, wearing the 2 suit, what was everyone else wearing? 3 A. They were in like military style. 4 Q. Okay. And so I guess two of those 5 individuals then approached you? 6 A. Yes, and stood in front of me. 7 Q. Okay. And were they holding 8 anything? What was in their hands? 9 A. The flashlight. One was. 10 Q. Okay. Were you holding anything? 11 A. No. 12 Q. Were there any firearms available to 13 you there? I mean, the room with the 14 fireplace, that's right behind you? 15 A. Yes -- no -- yeah. Yeah. 16 Q. Okay. 17 MRS. ANGLEMEYER: It's like 18 behind the China closet, the other room. 19 MR. BRADFORD: Right. That's 20 kind of what I'm envisioning. 21 BY MR. BRADFORD: 22 Q. Okay. So one of the cops is holding 23 a flashlight. And then take me through very 24 slowly exactly what happened. You already</p>	<p>1 Q. Do you know if it was a shield or 2 the flashlight? 3 A. I was blinded. I don't know. 4 Q. Okay. And you said you were hit 5 with something and someone grabbed your neck. 6 Did that happen at the same time or is that -- 7 A. Oh, I can tell you just how it was. 8 Q. Okay. Go ahead. 9 A. I was blinded and the next thing I 10 hear, bang, and like this here (indicating), 11 and that's all I remember. 12 Q. So you were indicating like someone 13 was grabbing your neck? 14 A. Yeah. Like they were going to push 15 me, you know, like they were going to knock -- 16 you know, shove me on the floor by the neck. 17 Q. Okay. And so how did you end up on 18 the floor? Do you remember that? 19 A. Here's what it was: I was pretty 20 well out and I was on the concrete floor, and 21 I had hit my head on something, on the side I 22 think the fireplace, and I was dizzy and I was 23 everything else. So I just laid there, trying 24 to figure out, what the hell, am I hurt or</p>
Page 35	Page 37
<p>1 kind of did, but if you can just kind of do 2 that again. 3 A. Surely. Well, he stood in front of 4 me. He started going like this here with the 5 light (indicating), and I was following the 6 light. Pretty soon I couldn't see no more. 7 Q. Was he saying anything to you? 8 A. No, not a word. And then the next 9 thing I know is, I got hit and grabbed, and 10 that's all I remember. 11 Q. Okay. Did both of them make 12 physical contact with you or just one of them 13 or you're not sure? 14 A. I got to say I'm not sure. 15 Q. Okay. 16 A. Because I'm not sure. 17 Q. Right. That's fine. 18 A. I was blinded. You know, I was 19 blinded. 20 Q. Okay. So you said you were hit with 21 something? 22 A. I don't know what. I was blinded 23 and I got hit with something. Something 24 knocked me out.</p>	<p>1 what, you know, and that's all I can tell you. 2 Q. Were you laying on your back or were 3 you -- 4 A. No; side, on the side. 5 Q. Okay. And do you remember if the 6 two cops stayed there with you, or what's the 7 next thing -- 8 A. Well, the next thing that happened 9 is I was laying there, and what I remember 10 next is a cop coming in, grabbed my arm and 11 grabbed the other one. You know, I'm on the 12 floor. They got both arms behind here and 13 then whatever, handcuffed me or whatever. 14 Q. Okay. And were they like zip tie 15 handcuffs; do you know? 16 A. I think they were real handcuffs. 17 Q. Okay. And did you see the person 18 who was handcuffing you? 19 Is that no? 20 A. No. You're right. I didn't try, to 21 be honest with you. 22 Q. From the time you went to the floor 23 to the time you got handcuffed, did anyone say 24 anything to you or did you say anything to</p>

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<p>1 anyone else?</p> <p>2 Is the answer no?</p> <p>3 A. No. I'm sorry.</p> <p>4 Q. Okay. Could you see anyone else who</p> <p>5 lived in the house, could you see them</p> <p>6 interacting with any of the police?</p> <p>7 A. My wife.</p> <p>8 Q. Tell me what you saw involving your</p> <p>9 wife.</p> <p>10 A. I was flat on the floor, but I could</p> <p>11 look in the hallway to where the room is where</p> <p>12 she walked out. And I was just laying there</p> <p>13 looking, and pretty soon it was like a hell of</p> <p>14 a commotion and like she went up in the air</p> <p>15 sort of and the next thing I know, boom, on</p> <p>16 the concrete, and she was screaming. And then</p> <p>17 I knew she got knocked down or knocked out.</p> <p>18 She was screaming, they knocked my teeth out.</p> <p>19 Q. Okay. Did you see who struck her?</p> <p>20 A. No, sir. They had -- two of them</p> <p>21 had their backs towards me, you know, and I</p> <p>22 could see -- in other words, two of them are</p> <p>23 like this. She was here (indicating).</p> <p>24 MRS. ANGLEMEYER: He can't see</p>	<p>1 goes to the ground?</p> <p>2 A. Absolutely, yes.</p> <p>3 Q. And can you tell which of the two</p> <p>4 cops caused that to happen?</p> <p>5 A. No, sir. I think they both did.</p> <p>6 They usually work in unison.</p> <p>7 Q. Okay. Well, I don't want you to</p> <p>8 assume what they were doing.</p> <p>9 Did either of them or both of them</p> <p>10 have a shield?</p> <p>11 A. I couldn't tell you, sir.</p> <p>12 Q. What was the lighting in that room?</p> <p>13 First of all, your wife said it was dark</p> <p>14 outside. Do you agree?</p> <p>15 A. Yeah.</p> <p>16 Q. And she indicated there was only</p> <p>17 night lights lit in the room. Do you agree</p> <p>18 with that?</p> <p>19 A. I agree with what I could see. I</p> <p>20 could see the two backs of the cops and I</p> <p>21 could see her in front of them.</p> <p>22 MRS. ANGLEMEYER: The lighting</p> <p>23 he asked you.</p> <p>24 BY MR. BRADFORD:</p>
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<p>1 your hands.</p> <p>2 THE WITNESS: Oh, you can't see</p> <p>3 my hands?</p> <p>4 BY MR. BRADFORD:</p> <p>5 Q. Right. Right.</p> <p>6 A. Two of them are like this</p> <p>7 (indicating).</p> <p>8 MRS. ANGLEMEYER: He can only</p> <p>9 see what's on the screen.</p> <p>10 THE WITNESS: Oh, okay.</p> <p>11 BY MR. BRADFORD:</p> <p>12 Q. That's fine. Just describe it.</p> <p>13 That's okay.</p> <p>14 A. Two of them are standing with their</p> <p>15 backs towards me and she had recently been</p> <p>16 coming out facing me.</p> <p>17 Q. Okay. So she was face-to-face with</p> <p>18 the two troopers?</p> <p>19 A. What did he say?</p> <p>20 Q. So she was facing the two cops?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay.</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And then at some point she</p>	<p>1 Q. Was the lighting, would you say,</p> <p>2 dim?</p> <p>3 A. Oh, yes.</p> <p>4 Q. Okay. At any point when these two</p> <p>5 cops were interacting with your wife, could</p> <p>6 you hear them -- and you told me about what</p> <p>7 she said afterwards, but could you hear them</p> <p>8 talking or screaming or anyone ordering</p> <p>9 anything?</p> <p>10 A. There was no words that I heard.</p> <p>11 Q. No words? All right.</p> <p>12 When the cops were running around,</p> <p>13 were they saying anything?</p> <p>14 A. Saying anything?</p> <p>15 Q. Yeah.</p> <p>16 A. No. When I asked them why are you</p> <p>17 doing this, he said because we can.</p> <p>18 Q. Right. I guess I was more so asking</p> <p>19 were they announcing themselves as, hey, State</p> <p>20 Police, search warrant, anything?</p> <p>21 A. Nobody ever did that. No, sir.</p> <p>22 Q. Okay. So I think I stopped you --</p> <p>23 first of all, one more thing before I leave</p> <p>24 this area. Ada, she was standing near the</p>

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<p>1 doorway to the hallway, is that fair to say 2 that, when she got struck? 3 A. She was facing out the way the cops 4 come in. 5 Q. Was she near the doorway? 6 A. No. She was back a ways. 7 Q. I mean, the doorway to the hallway, 8 I guess is what I'm asking. 9 A. Yes. That's what -- 10 Q. So the hallway is kind of behind 11 her? 12 A. From that doorway there was some 13 distance and then the two cops and then her. 14 Q. Okay. Do you know how much that 15 distance was? 16 A. Let me think a second. 17 Five, six feet, I'd say. 18 Q. Okay. 19 A. Maybe seven feet. 20 MRS. ANGLEMEYER: The room 21 ain't that big. 22 MR. BRADFORD: Okay. We're 23 just going with his recollection. 24 BY MR. BRADFORD:</p>	<p>1 Q. What were you saying? 2 A. What? 3 Q. What were you saying? 4 A. Saying? 5 Q. What were you screaming? What were 6 you saying? 7 A. Curse words. I called them what 8 they were. I said, who would ever do 9 something like this, you scummy, you know, and 10 I kept cursing for a while, and the next thing 11 I know, they got her up somehow and come 12 walking past me. And afterwards everybody -- 13 like everybody saying, who would -- you bring 14 the ambulance to the victim, not make the 15 victim walk to the ambulance. What's wrong 16 with them people? But they made her walk all 17 through the whole house and out in the 18 driveway. So that's -- 19 Q. Did you -- 20 A. But I was handcuffed. I couldn't 21 move, you know. 22 Q. Did you say anything? I understand 23 you personally felt that she should not be 24 walking to the ambulance. Did you say</p>
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<p>1 Q. All right. So now you are 2 handcuffed behind your back on the ground? 3 A. Yeah. Yes. 4 Q. First of all -- I got sidetracked 5 because I asked if you saw anyone else living 6 in the house interact with the cops, and as 7 you just described to me, you talked about 8 your wife. Did you see anybody else other 9 than your wife interact with the police at 10 that point? 11 A. At that point, no. 12 Q. Okay. What happens next after 13 you're handcuffed? 14 A. Well, she starts screaming, they 15 knocked my teeth out, and then I realized that 16 they knocked her teeth out and I seen her go 17 down on the floor, and the police had been 18 warned how many times she's in the bedroom and 19 just had major surgery. I warned them way 20 ahead of time upstairs. They told me that 21 they warned them. And she's screaming and 22 carrying on, and I'm screaming and carrying on 23 now. I'm handcuffed. I was trying to get out 24 of the handcuffs.</p>	<p>1 anything? 2 A. No, I didn't say anything. 3 Q. Okay. Were any other residents of 4 the house in the area that you were in? 5 A. Any what? 6 Q. Anyone else in the house, like any 7 other family members or Clyde or anyone else? 8 A. Yeah. Jeff was down here. 9 Q. What did you see happen with Jeff? 10 A. Well, just let me think a second and 11 I'll know. 12 Okay. They got him and they took 13 him out here in the kitchen, and then I heard 14 him say something to him. There was a cop -- 15 I'm sitting inside by the fireplace now, 16 sitting there like this, and I said, what's 17 your name? And he didn't answer. And again I 18 said, what's your name? And this time he 19 yelled out his name, and I said, you wouldn't 20 give me the right name anyhow. And then it 21 was one of the cops out here that I couldn't 22 see, they all yelled out in unison, that's his 23 name. Yes, it is, you know. 24 Q. What was his name?</p>

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<p>1 A. I can't...</p> <p>2 MR. BRADFORD: You can't give</p> <p>3 him hints.</p> <p>4 MRS. ANGLEMEYER: I got back</p> <p>5 trouble. Sorry.</p> <p>6 THE WITNESS: Anyhow, that's</p> <p>7 all that happened.</p> <p>8 BY MR. BRADFORD:</p> <p>9 Q. So --</p> <p>10 A. I think you may know. There's</p> <p>11 another thing. I didn't see it, but he got</p> <p>12 hit.</p> <p>13 Q. How do you know that?</p> <p>14 A. Oh, screamed and I heard a cracking</p> <p>15 noise.</p> <p>16 Q. Okay. And that happened when you</p> <p>17 were in the other room, so you didn't actually</p> <p>18 see it?</p> <p>19 A. Handcuffs on the floor it happened.</p> <p>20 Q. You're still handcuffed on the</p> <p>21 floor --</p> <p>22 A. Yeah.</p> <p>23 Q. -- when that happened?</p> <p>24 A. Yep.</p>	<p>1 else yelling or cursing at the police?</p> <p>2 A. No.</p> <p>3 Q. So the cuffs are taken off you.</p> <p>4 Where did you go? What happens next?</p> <p>5 A. I sat on the couch.</p> <p>6 Q. The couch in that room that you were</p> <p>7 in?</p> <p>8 A. Yes.</p> <p>9 Q. And is anyone else there with you?</p> <p>10 A. It was -- Renae was down here.</p> <p>11 Q. Okay. Go ahead.</p> <p>12 A. Because she asked can they -- can I</p> <p>13 give the dogs their medicine. And now this is</p> <p>14 secondary police, like not them uniformed</p> <p>15 ones. This was like in plain clothes. The</p> <p>16 plain clothes guys said, yeah, go ahead. So</p> <p>17 he told her she could give the dogs the</p> <p>18 medicine.</p> <p>19 Q. So let me stop you there actually.</p> <p>20 I'm glad you mentioned that. So when someone</p> <p>21 gets you up and uncuffs you, were you uncuffed</p> <p>22 while you were on the ground?</p> <p>23 A. On the ground. I was uncuffed on</p> <p>24 the ground.</p>
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<p>1 Q. Okay. Did you see anybody else</p> <p>2 interact with the police while you were in</p> <p>3 that room, I guess?</p> <p>4 Is the answer no?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 A. No.</p> <p>8 Q. You just have to say no so the court</p> <p>9 reporter can pick it up.</p> <p>10 A. No.</p> <p>11 Q. Okay. So now you're handcuffed on</p> <p>12 the ground. Ada has been taken out of the</p> <p>13 room and as we learned that she was taken to</p> <p>14 the see EMTs outside, right?</p> <p>15 A. Yep.</p> <p>16 Q. What happened next for you?</p> <p>17 A. Well, I'm laying on the floor and</p> <p>18 then a cop come in and took my handcuffs off</p> <p>19 and let me get up.</p> <p>20 Q. Okay. And did you have a</p> <p>21 conversation with that cop?</p> <p>22 A. I was hurting.</p> <p>23 Q. You said you were yelling and</p> <p>24 cursing at the cops at one point. Was anybody</p>	<p>1 Q. Okay. Were you uncuffed by one of</p> <p>2 the troopers, one of the people --</p> <p>3 A. Yes. Yes. One of the nasty ones.</p> <p>4 Q. Okay. And so then you sit on the</p> <p>5 couch and then at some point, is that the last</p> <p>6 time you see any of the troopers?</p> <p>7 A. Yeah. They disappeared and then</p> <p>8 like the locals come.</p> <p>9 Q. Okay.</p> <p>10 A. Because he said he was more a</p> <p>11 township cop. Then he want to give me coffee.</p> <p>12 MRS. ANGLEMEYER: When did they</p> <p>13 send you to the hospital?</p> <p>14 THE WITNESS: I sent myself to</p> <p>15 the hospital.</p> <p>16 MRS. ANGLEMEYER: Oh, okay.</p> <p>17 THE WITNESS: Okay. Go ahead.</p> <p>18 BY MR. BRADFORD:</p> <p>19 Q. You sat yourself down on the couch?</p> <p>20 A. I sat on the couch.</p> <p>21 Q. All right. You said Renae came</p> <p>22 downstairs. Was that after you were on the</p> <p>23 couch?</p> <p>24 A. Yeah. I was sitting in there on the</p>

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1 couch.  
2 Q. And then she comes downstairs?  
3 A. Yeah.  
4 Q. Okay.  
5 A. Yes.  
6 Q. And where was Jeff? Was he still in  
7 the other room or did he come into that room  
8 as well?  
9 A. You know, I don't know. I lost  
10 track of him.  
11 Q. Okay. Was Clyde in the area?  
12 A. Yes.  
13 Q. Where was he?  
14 A. He was laying on the floor next to  
15 me.  
16 Q. Okay. Did you see his interaction  
17 with the police?  
18 A. Yes.  
19 Q. What happened to Clyde?  
20 A. Well, Clyde come out the bedroom  
21 just walking out and one of the -- this is now  
22 the uniformed guys, run over and, pow, knocked  
23 him flat. He's only 100 pounds, on the  
24 concrete and then stood on him, stood on him

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1 with a foot and then they handcuffed him.  
2 Q. Okay. And did they eventually  
3 uncuff him like they did with you?  
4 A. Yes.  
5 Q. While he was handcuffed on the  
6 ground, did anyone make physical contact with  
7 him other than to uncuff him?  
8 A. Well, you know, they use boots a  
9 lot. He got hit here somehow (indicating). I  
10 didn't --  
11 Q. Where are you indicating?  
12 A. He got hit under the armpit somehow,  
13 because it was all black and blue.  
14 Q. Okay. And could that have been when  
15 he went down to the ground initially?  
16 A. When they were running around, yeah.  
17 I think he got kicked. I didn't see it. I  
18 think he got kicked in here somehow, because  
19 it's all black and blue, under the armpit.  
20 Q. Okay. Let me ask you this: So you  
21 were standing around for a while before they  
22 took you to the ground. Did the same thing  
23 happen with Clyde?  
24 A. No. As soon as he come out his

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1 bedroom, they knocked him flat.  
2 Q. Okay. But then you just stood there  
3 for a while --  
4 A. Yeah.  
5 Q. -- watching the scene?  
6 A. No. No. Wait. We got to make it  
7 right. I was handcuffed and on the concrete  
8 when he come out his room.  
9 Q. Okay. So you were already  
10 handcuffed?  
11 A. Yeah.  
12 Q. Okay. So he didn't come out of his  
13 room -- you had been up and around and  
14 standing by the fireplace and then handcuffed  
15 and then he comes out?  
16 A. Right.  
17 Q. Okay. So now you're on the couch  
18 with Clyde and Renae?  
19 A. Yeah. Yes.  
20 Q. And that's the last you saw of the  
21 state troopers?  
22 A. Yes.  
23 Q. Or at least you later found out were  
24 state troopers. Okay.

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1 Was there any type of argument or  
2 discussion afterwards with the state troopers  
3 that you had?  
4 A. Not the state troopers, no. The  
5 locals, you know, they wanted to talk to you  
6 and, you know, we didn't know, this and that,  
7 and they wanted a conversation, and I told the  
8 one local from Moorestown, go get an honest  
9 job. So that's what I said to him. He said,  
10 I like my job.  
11 I said, I don't.  
12 Q. Okay. And are you aware some of  
13 your family members were charged with crimes  
14 that day?  
15 A. That day?  
16 Q. Yes.  
17 A. I didn't know if he was charged with  
18 crimes. I know they was going to take him  
19 away.  
20 Q. Okay. My information is that Mark,  
21 Joe Kluska, and Tyeler were charged with  
22 crimes that day.  
23 A. Yes. I heard that.  
24 Q. Okay. Did you go to the hospital

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1 that day?  
2 A. Yes.  
3 Q. And that's Saint Luke's Anderson  
4 Campus?  
5 A. Yes.  
6 Q. And, first of all, how did you get  
7 there?  
8 A. Wait a minute.  
9 MRS. ANGLEMEYER: How did you  
10 get there?  
11 THE WITNESS: The ambulance.  
12 Okay. I got there by ambulance.  
13 BY MR. BRADFORD:  
14 Q. You got there by ambulance, okay.  
15 And what did they treat you for at  
16 the hospital?  
17 A. I had a little hole here on the side  
18 of my head that was bleeding (indicating).  
19 Q. And you're indicating kind of like  
20 almost your right temple?  
21 A. Like by the right side.  
22 Q. Temple, okay.  
23 A. And my leg was -- that's why I  
24 really went to the hospital. My leg was

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1 nature of that problem in the past?  
2 A. Yeah. It hurt. You know, it was  
3 like hurt when I walked.  
4 Q. Okay. And did you ever get a brace  
5 or was --  
6 A. I went in.  
7 Q. -- there any surgery or anything  
8 like that?  
9 A. And I got an x-ray, and that was the  
10 end of it. No, no, no. Everything was okay.  
11 Q. Okay.  
12 A. I never went back.  
13 Q. So did you eventually get further  
14 treatment for your knee after February 23rd,  
15 2018?  
16 A. Oh, yeah. Yes. My knee got  
17 progressively worse and worse and worse, so I  
18 said I got to go, you know, get this checked  
19 again, get it checked. I went up. They  
20 checked -- they x-rayed it and then they seen  
21 something wasn't right, and they MRI'd it, and  
22 it's a mess.  
23 MRS. ANGLEMEYER: He always  
24 forgets this, but his meniscus was torn.

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1 starting to bother me pretty bad. It felt  
2 like there was water on it, you know,  
3 something. So I went down and they cleaned my  
4 eye, checked my eye, and cleaned me up, the  
5 blood and everything there, and then they  
6 x-rayed my knee. And I said, you got to MRI  
7 it, but they didn't want to do that. So  
8 that's what happened.  
9 Q. Okay. And the x-ray didn't show any  
10 structural damage; is that correct?  
11 A. Right.  
12 Q. Okay. How long were you --  
13 A. Yes. I'm sorry.  
14 Q. About how long were you at the  
15 hospital there for? A couple hours?  
16 A. Oh, yeah. Yes.  
17 Q. Okay. Which knee was this?  
18 A. Right.  
19 Q. Right knee.  
20 Did you ever in the past have any  
21 issues with your right knee?  
22 A. At one time, but nothing showed up.  
23 I thought I had a problem, but I didn't.  
24 Q. Okay. Do you remember like the

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1 MR. BRADFORD: Okay. Yeah.  
2 I'll get to that. Thank you.  
3 BY MR. BRADFORD:  
4 Q. I'm going to show you a couple of  
5 documents related to your medical care. So  
6 give me one second.  
7 A. Sure.  
8 Q. I'm sharing my screen now. These  
9 are notes from, it looks like -- well, first  
10 of all, I'll have this marked as D-10. It's  
11 about 20 pages of medical records I just  
12 pulled from all the records we have in this  
13 case.  
14 A. Okay.  
15 Q. So I'm going to go to Page 8, which  
16 is Bates stamped PSP-1123 that we got as part  
17 of the subpoena. I'm directing your attention  
18 to an entry from, it looks like, from March  
19 30, 2018, Bushkill Family Practice, and I'm  
20 directing your attention to this red box here.  
21 I'll just read it to you. "Patient come into  
22 office wanting an MRI for right knee pain. He  
23 said he knows there is something wrong and had  
24 an x-ray done at the hospital, which was

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<p style="text-align: right;">Page 58</p> <p>1 normal. Patient refuses to see ortho, have 2 shots or physical therapy. He will, quote, 3 'do what he has to do,' unquote, and left the 4 office." 5 Do you remember that? 6 A. What was the date? 7 Q. It was March 30th, 2018. So it 8 would have been about a month afterwards. 9 A. Okay. Right. Yes. 10 Q. That was before you got the MRI? 11 MRS. ANGLEMEYER: Yes, I think 12 so. 13 THE WITNESS: Yes. 14 BY MR. BRADFORD: 15 Q. Okay. 16 A. I have to get the dates in my head. 17 Q. And that's part of the reason I'm 18 showing you documents with dates on them. 19 Do you remember being instructed 20 that you should see ortho, have shots or get 21 physical therapy? 22 A. I went in. They MRI'd it and then 23 they wanted me to go to therapy, but I said I 24 think this hurts too much, I'm not going to</p>	<p style="text-align: right;">Page 60</p> <p>1 red box, it says, "Right knee lateral meniscus 2 tear with associated parameniscal cyst, medial 3 meniscus tear," and it says, "1, patient has 4 been experiencing right knee pain which 5 affects him daily basis for the past two 6 years. Explained the procedure of a right 7 knee arthroscopic partial medial and lateral 8 meniscectomies with decompression of 9 parameniscal cyst in detail as well as risks 10 and benefits. He has elected to proceed." 11 Is that your recollection of what 12 was happening with your knee? 13 A. Yes. 14 Q. Okay. At any point did anyone tell 15 you, once they determined there was a torn 16 meniscus, exactly when that happened? 17 A. No. They never said. 18 Q. So this took place earlier this 19 year, right, March 12th, 2020? 20 A. When I got the operation? 21 Q. Yes. Yes. 22 A. Yes. That sounds right. 23 Q. Okay. How has your knee been since 24 then?</p>
<p style="text-align: right;">Page 59</p> <p>1 therapy, and the guy says -- he looked at the 2 things and the MRI and then they were going to 3 operate. 4 Q. Okay. All right. 5 MRS. ANGLEMEYER: You're on 6 hold. 7 MR. BRADFORD: Yes. Give me 8 one second here. I'm just trying to -- 9 THE WITNESS: Yeah. No problem 10 at all. 11 MR. BRADFORD: -- figure out 12 where I'm going here. 13 BY MR. BRADFORD: 14 Q. Did you eventually get surgery on 15 your right knee? 16 A. Yes. 17 Q. And I'm now on Page 14 of this 18 Exhibit D-10. It's going to be a series of 19 documents that are in order. This one is 20 Bates stamped PSP-3302, and I'm just going to 21 direct your attention to the bottom of this. 22 These are notes from the day you got surgery, 23 I'll represent to you. It says, "Right 24 knee" -- and at the bottom of the page in the</p>	<p style="text-align: right;">Page 61</p> <p>1 A. No good. Now it seems to got weak 2 and it kicks out on me sometimes. 3 Q. Did they say there was any 4 complications with the surgery or did it go as 5 planned? 6 A. I didn't go back. 7 Q. Okay. 8 MRS. ANGLEMEYER: He's got an 9 appointment coming up. 10 BY MR. BRADFORD: 11 Q. So you had the surgery in March, I 12 think we've established, and you haven't been 13 back since the surgery? 14 MRS. ANGLEMEYER: Yeah, you 15 did. 16 THE WITNESS: Yeah. Yeah. I 17 went back. 18 MRS. ANGLEMEYER: One time. 19 THE WITNESS: One time. 20 MRS. ANGLEMEYER: And we have 21 another appointment coming. 22 BY MR. BRADFORD: 23 Q. Did they want you to do any physical 24 therapy or anything associated with recovery?</p>

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1 A. No. He didn't say.  
2 Q. So they just do the surgery. You  
3 came back for an appointment. Did they say  
4 everything looks good at the appointment that  
5 you went to, or what did they tell you?  
6 A. Well, he told me that my knee looked  
7 okay, and if I got any problems, I should come  
8 down and see him.  
9 Q. Okay. And your wife just mentioned  
10 that you have an appointment coming up, but  
11 you haven't seen him since then?  
12 A. No, not since the operation.  
13 Q. Not since the operation.  
14 I do want to talk a little bit about  
15 your -- we already talked about this a little  
16 bit, about you having a breakdown, and I just  
17 want to talk about that a little bit. I don't  
18 want to pry, but I just want to nail a few  
19 things down.  
20 I'm going to show you another note,  
21 because I think you did say about three months  
22 after the incident is when things got bad for  
23 you?  
24 A. Really bad.

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1 Q. Okay. Right. And I'm still on this  
2 document and I'm now bouncing up to -- I'm  
3 starting at the ninth page of this document,  
4 D-10, and I'm on Bates stamped PSP-1112. And  
5 this indicates you went to Bushkill Family  
6 Practice on May 17th, 2018. Do you see that?  
7 A. Just a minute.  
8 MRS. ANGLEMEYER: Yeah,  
9 probably.  
10 BY MR. BRADFORD:  
11 Q. Well, that's the date it says at the  
12 top there, right, May 17th, 2018? You'll  
13 agree with that, right?  
14 A. Yes.  
15 Q. And it indicates that you were there  
16 for 25 minutes?  
17 A. Sounds right, yes.  
18 Q. Okay. You were there for -- it says  
19 chief complaint was depression?  
20 A. Yes.  
21 Q. I'm going to scroll down to -- well,  
22 on Page 1114 is a description of that visit in  
23 the red box. And you can go ahead and read  
24 that to yourself and then we'll talk about it.

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1 (Brief pause.)  
2 A. Okay. I read that.  
3 Q. Okay. So is this the first time  
4 that you sought help for your mental health  
5 related to this incident?  
6 A. Yes.  
7 Q. Okay. And were you given a  
8 prescription at this point?  
9 A. Yes.  
10 Q. And I'm scrolling down to Page 1115,  
11 and that indicates in the red box there you  
12 were prescribed Sertraline, which I guess is  
13 what you were talking about earlier?  
14 MRS. ANGLEMEYER: Zoloft.  
15 MR. BRADFORD: Right, which is  
16 the name brand.  
17 MRS. ANGLEMEYER: It's the main  
18 name, but he has like a cheaper medicine,  
19 but it's the same thing.  
20 MR. BRADFORD: Okay. So it's  
21 the equivalent.  
22 MRS. ANGLEMEYER: Yes.  
23 BY MR. BRADFORD:  
24 Q. Okay. You agree with your wife's

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1 recollection there, Mr. Angelmeyer?  
2 A. Yes.  
3 Q. Okay. And so is it fair to say  
4 you've been on that medication since May of  
5 2018?  
6 A. Yes, sir.  
7 Q. Has that dosage increased or  
8 decreased along the way here?  
9 MRS. ANGLEMEYER: The  
10 medication?  
11 MR. BRADFORD: Yes.  
12 MRS. ANGLEMEYER: It's about  
13 the same.  
14 MR. BRADFORD: Okay.  
15 BY MR. BRADFORD:  
16 Q. All right. Before February 2018,  
17 did you ever have any bouts with depression?  
18 A. Not that I know of. No, sir.  
19 Q. Okay. You never sought treatment  
20 for that?  
21 A. No.  
22 Q. Aside from taking the -- I'm going  
23 to call it the Zoloft just because that's easy  
24 to say. Do you regularly see a doctor for

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1 your depression or how often do you -- or not,  
2 I guess is the question?

3 MRS. ANGLEMEYER: About every  
4 three months he goes to the doctor.

5 MR. BRADFORD: Every three  
6 months he goes to the doctor for --

7 MRS. ANGLEMEYER: About that.

8 MR. BRADFORD: Is it for  
9 depression or other things?

10 MRS. ANGLEMEYER: He goes for  
11 overall.

12 MR. BRADFORD: Okay.

13 MRS. ANGLEMEYER: In fact, I  
14 forced him to go to the doctor, because  
15 he was in no state to take care of  
16 himself.

17 MR. BRADFORD: Okay. You're  
18 talking about in May 2018?

19 MRS. ANGLEMEYER: Yes. I  
20 couldn't handle it no more. He had to  
21 go.

22 MR. BRADFORD: Okay. All  
23 right.

24 Give me one second. I think

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1 MRS. ANGLEMEYER: Ping pong.

2 THE WITNESS: A ping pong table  
3 and cut the surveillance camera.

4 MRS. ANGLEMEYER: They  
5 destroyed the camera. I think they took  
6 one with them.

7 BY MR. BRADFORD:

8 Q. Do you know if this was done by the  
9 troopers or -- it's my understanding the  
10 troopers were there and then local cops were  
11 there and they were there completing the  
12 search. The troopers got all the people  
13 together and then handed over the scene to the  
14 local cops. Do you know -- first of all, you  
15 didn't personally witness any of this  
16 happening, right?

17 A. No, sir, I did not.

18 Q. Do you know whether it was the  
19 troopers or the local cops that did the damage  
20 you described?

21 A. Beings they cut the surveillance  
22 camera wires, I would say it was the troopers.

23 Q. Okay. But you're just kind of  
24 speculating on that?

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1 I'm almost done.

2 BY MR. BRADFORD:

3 Q. I know what I wanted to ask you. So  
4 was there damage to your house from the  
5 incident?

6 A. Yes, sir.

7 Q. I mean, I assume it was the entry  
8 points that they --

9 A. Yeah, the entry points and let's  
10 see. Let's go through the --

11 MRS. ANGLEMEYER: All the  
12 upstairs doors.

13 THE WITNESS: All the upstairs  
14 doors, inside doors, and --

15 MRS. ANGLEMEYER: Game room.

16 THE WITNESS: They ransacked  
17 everything, you know. Let's go out to  
18 the game room. There they smashed --  
19 threw cue balls at a game my wife had,  
20 and it's a very expensive thing. It's  
21 where two people sit in and play against  
22 each other. They smashed that, threw a  
23 cue ball through it, smashed -- what was  
24 that?

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1 A. Yes, sir.

2 Q. Okay. Did you ever seek  
3 compensation for repairing these items?

4 A. No. I want to wait to talk to, you  
5 know, the lawyers, see what we can do.

6 Q. Yes. I'm saying like at the time  
7 this happened, did you call and complain or do  
8 anything like that to the State Police or the  
9 local police or anyone about the damage?

10 A. Okay. I wrote -- at the time, I  
11 immediately also knew I was robbed.

12 MRS. ANGLEMEYER: Don't start.

13 BY MR. BRADFORD:

14 Q. Are you talking about the guns?

15 A. I'm sorry. What?

16 Q. Is this where -- I know. I know.  
17 I'm not asking about that. I want to know  
18 about the --

19 MR. ZEIGER: Can I just speak  
20 for a moment?

21 MR. BRADFORD: Yes.

22 MR. ZEIGER: He's confused.  
23 He's talking about a different period of  
24 his life.

18 (Pages 66 to 69)

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<p>1 MR. BRADFORD: Okay.</p> <p>2 MR. ZEIGER: You got to slow</p> <p>3 down a little bit. You can ask any</p> <p>4 questions you want. I haven't objected</p> <p>5 much, but you got to slow down, because</p> <p>6 he's thinking about something like 10 or</p> <p>7 20 years before this case. Okay?</p> <p>8 MR. BRADFORD: Okay.</p> <p>9 BY MR. BRADFORD:</p> <p>10 Q. All I'm trying to figure out is --</p> <p>11 I'm not saying about as part of this lawsuit,</p> <p>12 which is happening right now, but at the time</p> <p>13 before you had a lawsuit, did you or anyone on</p> <p>14 your behalf -- let's not ask it that way. Did</p> <p>15 you or your wife or anyone in your house</p> <p>16 contact either the State Police or the local</p> <p>17 cops to say, hey, you did all this damage to</p> <p>18 my house, I want you to pay for the repairs or</p> <p>19 anything like that?</p> <p>20 A. No.</p> <p>21 Q. The answer is no?</p> <p>22 MRS. ANGLEMEYER: No. He said</p> <p>23 no.</p> <p>24 THE WITNESS: No.</p>	<p>1 incident?</p> <p>2 A. No, sir.</p> <p>3 Q. None at all?</p> <p>4 A. Well, I had a cataract operation.</p> <p>5 Q. Okay.</p> <p>6 A. Long ago.</p> <p>7 Q. Okay. Has anyone told you that your</p> <p>8 current condition is attributed to the injury</p> <p>9 you suffered on February 23rd, 2018?</p> <p>10 A. He didn't commit himself.</p> <p>11 Q. Okay.</p> <p>12 A. That's all I can tell you. Except</p> <p>13 that there's a leaking blood vessel.</p> <p>14 Q. Okay. Can that happen just over</p> <p>15 time just as part of getting old?</p> <p>16 A. Probably. I don't know.</p> <p>17 Q. And when did this issue start?</p> <p>18 MRS. ANGLEMEYER: It started</p> <p>19 after he got hit in the head. That's</p> <p>20 what happened. Sorry.</p> <p>21 BY MR. BRADFORD:</p> <p>22 Q. I'm saying like was it a couple</p> <p>23 months after, was it a year after?</p> <p>24 MRS. ANGLEMEYER: It was</p>
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<p>1 BY MR. BRADFORD:</p> <p>2 Q. Okay. The injury right next to your</p> <p>3 eye, did that heal? I mean, we talked about</p> <p>4 your other injuries.</p> <p>5 A. Yes. What do you want to know?</p> <p>6 Q. I just want to make sure there's no</p> <p>7 further problems from that particular part of</p> <p>8 your injury.</p> <p>9 A. Okay. Maybe three, four months or,</p> <p>10 I don't know, a year later, my right eye, I</p> <p>11 started -- I couldn't see very good, and so I</p> <p>12 thought it was cataracts, but we went to an</p> <p>13 eye specialist and he said there was a busted</p> <p>14 blood vessel in the back of the cornea and I'm</p> <p>15 going blind. And I said -- then I'm</p> <p>16 getting -- every month I get a shot to the</p> <p>17 eyeball back to the cornea, and that's where I</p> <p>18 am. I may be blind -- see, this was all --</p> <p>19 this is where I got hit here (indicating).</p> <p>20 This was all bloodshot. And so he's saying I</p> <p>21 might go blind, but he's giving me these</p> <p>22 injections.</p> <p>23 Q. Did anyone tell you it was from --</p> <p>24 did you have any eye issues before this</p>	<p>1 gradual. It went gradual. He started</p> <p>2 that he couldn't see good and then he</p> <p>3 couldn't see good and finally I said,</p> <p>4 well, you better go to the eye doctor,</p> <p>5 and that's what happened.</p> <p>6 BY MR. BRADFORD:</p> <p>7 Q. Okay. Are there any other injuries</p> <p>8 that you suffered that we haven't talked about</p> <p>9 today?</p> <p>10 A. No, sir.</p> <p>11 Q. Okay.</p> <p>12 MR. BRADFORD: I thank you for</p> <p>13 your time, Mr. Anglemeyer. Again, like I</p> <p>14 told your wife earlier, I appreciate it</p> <p>15 and I appreciate your answers and --</p> <p>16 THE WITNESS: Well, I</p> <p>17 appreciate you too.</p> <p>18 MR. BRADFORD: Okay. All</p> <p>19 right.</p> <p>20 And you're good, Brian, right?</p> <p>21 MR. ZEIGER: Yes.</p> <p>22 (Exhibit D-10 marked for</p> <p>23 identification.)</p> <p>24 (Witness excused.)</p>

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(Deposition concluded at 1:57  
p.m.)  
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CERTIFICATE  
I HEREBY CERTIFY that the  
proceedings, evidence and objections are  
contained fully and accurately in the  
stenographic notes taken by me upon the  
foregoing matter, and that this is a true and  
correct transcript of same.

-----  
MICHELE L. MURPHY  
RPR-Notary Public

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